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July 28, 1995

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(Blossom, TX and DeQueen, AR)
MM Docket No. 95-75, RM-8615

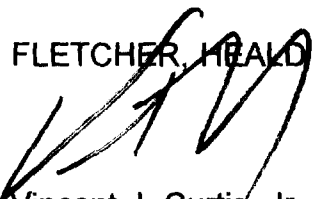
Dear Mr. Caton:

Transmitted herewith, on behalf of Coalgate Broadcasters, are an original and four copies of its "Counter-Proposal" in connection with the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate with the undersigned attorney.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.


Vincent J. Curtis, Jr.
Counsel for Coalgate Broadcasters

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BEFORE THE

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Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b),) MM Docket No. 95-75
Table of Allotments,)
FM Broadcast Stations) RM-8615
(Blossom, Texas, and)
DeQueen, Arkansas))

Directed to: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

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COUNTER-PROPOSAL OF COALGATE BROADCASTERS

Comes now Coalgate Broadcasters, by its attorneys, and respectfully submits its Counter-Proposal in connection with the above-referenced proceeding. In support, the following is stated:

1. As reflected in the Notice of Proposed Rule Making and Order to Show Cause (NPRM) DA95-1156, released June 6, 1995, Red River Wireless Communications ("Petitioner") has requested that the Commission allocate Channel 224C2 to Blossom, Texas and substitute Channel 227A for Channel 224A at DeQueen, Arkansas and modify the license of Station KDQN(FM) accordingly. In response thereto, Coalgate Broadcasters, for the reasons set forth below, proposes the following, which is in direct conflict with the proposal in the NPRM:

<u>Channel No.</u>		
<u>City</u>	<u>Present</u>	<u>Proposed</u>
Coalgate, OK	---	224C2
DeQueen, AR	224A	227A ¹

2. In contrast to Blossom, which is a small suburb of Paris, Texas,² Coalgate is the county seat of its county, Coal County. Coalgate is an incorporated community which has its own post office, hospital and bank. Blossom, on the other hand, has very little commercial retail business and is primarily a residential bedroom community. Again, in contrast, Coalgate, which has its own Chamber of Commerce (Blossom, not surprisingly, has no Chamber of Commerce), has its own downtown shopping area, several supermarkets, clothing stores, eating establishments, hardware store, retail and commercial stores. Coalgate has a Wrangler Jeans manufacturing plant, which employs several hundred people, and a lumberyard. In addition, Coalgate has a weekly newspaper (the Coalgate Record-Register) as well as its own police and fire department.³ The proposal would provide the first local aural transmission service to Coalgate. In comparison, Coalgate is clearly the preferred community.

¹As is the case with the noticed proposal, it will be necessary to modify the operation of Station KDQN(FM) under this counter-proposal. Coalgate Broadcasters agrees to reimburse the licensee of KDQN(FM) for reasonable costs of moving to Channel 227A, if this proposal is ultimately adopted.

²At the present time, there are five (5) stations licensed to Paris, Texas (3 FMs and 2 AMs).

³Blossom has none of these activities/facilities.

3. As reflected in the attached Engineering Statement, the Coalgate proposal will comply with all the technical requirements of the Commission.

4. If allocated, Coalgate Broadcasters will promptly prepare and file an application for Channel 224C2 at Coalgate.

Conclusion

WHEREFOR, the premises considered, it is requested that the Commission allocate Channel 224C2 to Coalgate, Oklahoma and modify the license of Station KDQN(FM) accordingly.

Respectfully submitted,

COALGATE BROADCASTERS

By: 

Vincent J. Curtis, Jr.

Its Attorney

FLETCHER, HEALD & HILDRETH, P.L.C.
11th Floor
1300 N. 17th Street
Rosslyn, VA 22209
(703) 812-0400

July 28, 1995

**ENGINEERING STATEMENT
ON BEHALF OF
COALGATE BROADCASTERS
COALGATE, OKLAHOMA**

**COUNTER PROPOSAL TO BLOSSOM, TEXAS
RM-8615**

INTRODUCTION:

This Engineering Statement has been prepared on behalf of Coalgate Broadcasters, Coalgate, Oklahoma, the petitioner in support of a counter proposal to assign **Channel 224-C2**, to Coalgate, Oklahoma, in lieu of Blossom, Texas. This proposal would be in full compliance with the minimum distance separation required between stations in Rule 73:207. This assignment can be made to Coalgate, Oklahoma, without any other changes in the table of assignments as amended. This proposal, however, is in conflict with the one proposed for Blossom, Texas. Therefore, it is considered a counter proposal to Blossom, Texas, RM-8615.

ALLOCATION STUDY:

A computer allocation study has been made to determine that this channel can be utilized at Coalgate, Oklahoma. That allocation study is attached to this engineering statement as **Exhibit 1**. The petitioner is familiar with the area and feels

that a site can be found for the antenna and transmitter in the area of the following coordinates, N. Lat. 34-28-15 W. Lng. 95-54-01. This site meets all the requirements of the rules concerning the assignment of 224 C-2 to Coalgate, Oklahoma.

CONTOUR CONSIDERATION:

Exhibit 2 is a computer generated map which illustrates that this Channel, operating as a Full Class C-2, can comply with the minimum spacing requirement of 73:207 and place a city grade contour over the City of Coalgate, Oklahoma. Exhibit 3 shows the area where the antenna and transmitter may be located. In order to determine that a city grade contour would be provided to the city from the hypothetical coordinates, a terrain study was conducted from those coordinates and the procedure set out in the commissions rules was utilized. Exhibit 2 confirms that this counter proposal complies with 73:315, and places a 70 dBu contour over the complete City of Coalgate, Oklahoma. Exhibit 4 is a tabulation of all eight radials utilized in this study. These tabulations give the average elevation from 3 to 16 kilometers in meters AMSL, the effective antenna height in meters above AAT, and the distance to the 70 dBu city grade contour and the 60 dBu service grade contour. When determining the Average

Elevation above the terrain, only the eight cardinal radials were utilized. The ninth radial, which is the one passing through the center of Coalgate, Oklahoma, was not included in the average.

Exhibit 5 is a computer generated map which illustrates the 70 dBu contour and the 60 dBu contour. These are the predicted field intensity contours and indicate only the approximate extent of coverage over average terrain in the absence of interference. **Exhibit 6** shows that there is no shadowing or obstructions between the propose site and the city of Coalgate, Oklahoma.

CONCLUSION:

Based on this information, it appears that this channel can be assigned to Coalgate, Oklahoma, as a Class C-2 and complies with the commissions rules 73:207 and 73:315. In addition, it will be far more beneficial to the general public to assign this channel to Coalgate, Oklahoma, than to Blossom, Texas. Therefore the petitioner request the amendment of the Federal Communications Commission Table of Assignments 73:202(b), by assigning Channel 224-C2 to Coalgate, Oklahoma, in lieu of Blossom, Texas. When this channel is assigned to Coalgate, Oklahoma, the petitioner will promptly apply for a

construction permit to construct a Full Class C-2 station at
Coalgate, Oklahoma.

/s/ Olvie E. Sisk

Olvie E. Sisk

Sisk Engineering, Inc.

Fulton, Mississippi

July 24, 1995

KEY TO EXHIBITS

EXHIBIT 1: ALLOCATION STUDY

EXHIBIT 2: CITY CONTOUR MAP

EXHIBIT 3: MAP SHOWING SITE AREA

EXHIBIT 4: DISTANCE TO CONTOURS

EXHIBIT 5: SERVICE CONTOURS

EXHIBIT 6: TERRAIN PROFILE

EXHIBIT 1

GENE SISK - SISK ENGINEERING
HWY. 25 S. - RADIO BUILDING - FULTON MS 38843

COALGATE OK.

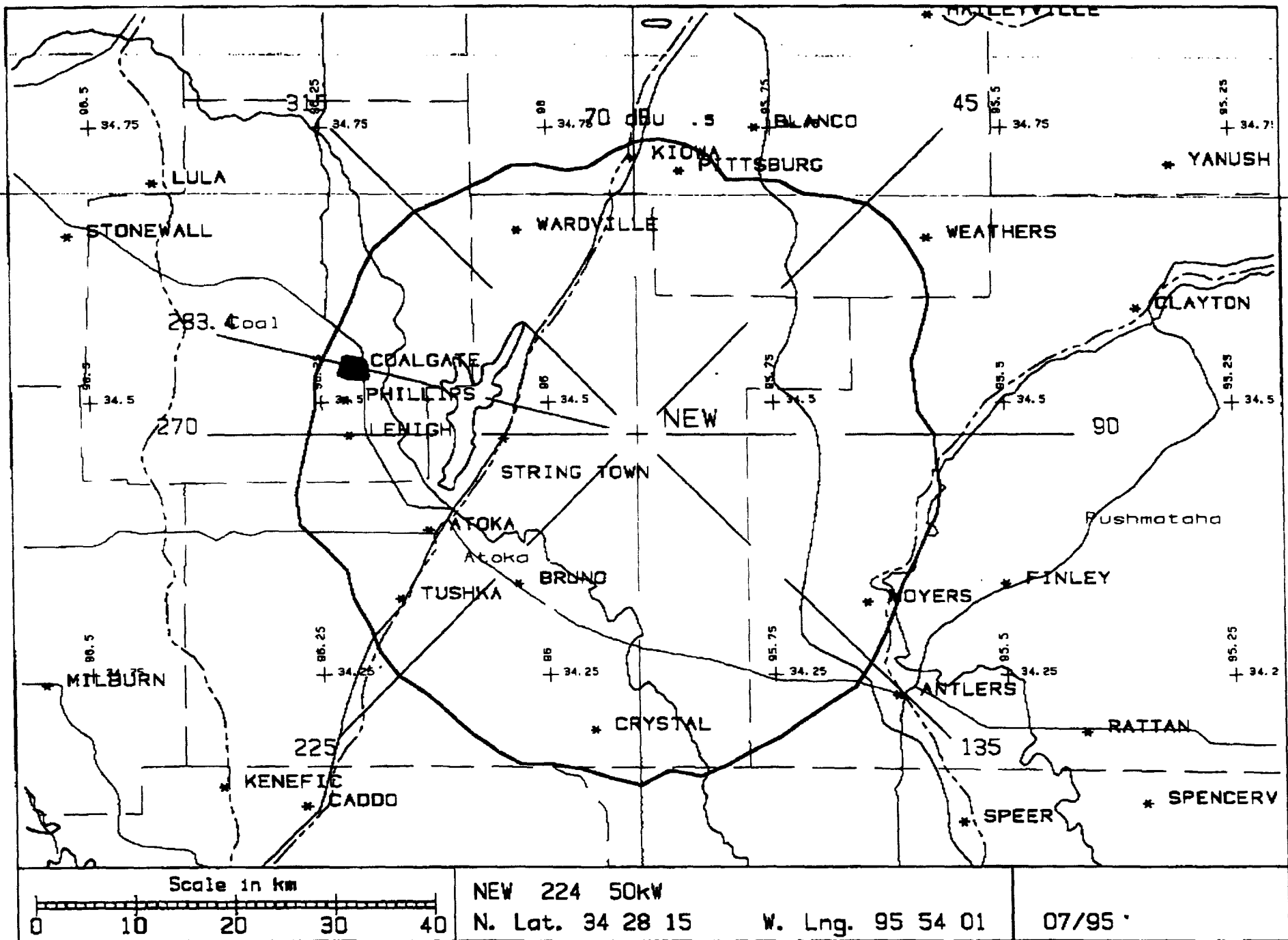
REFERENCE
34 28 15 N
95 54 01 W

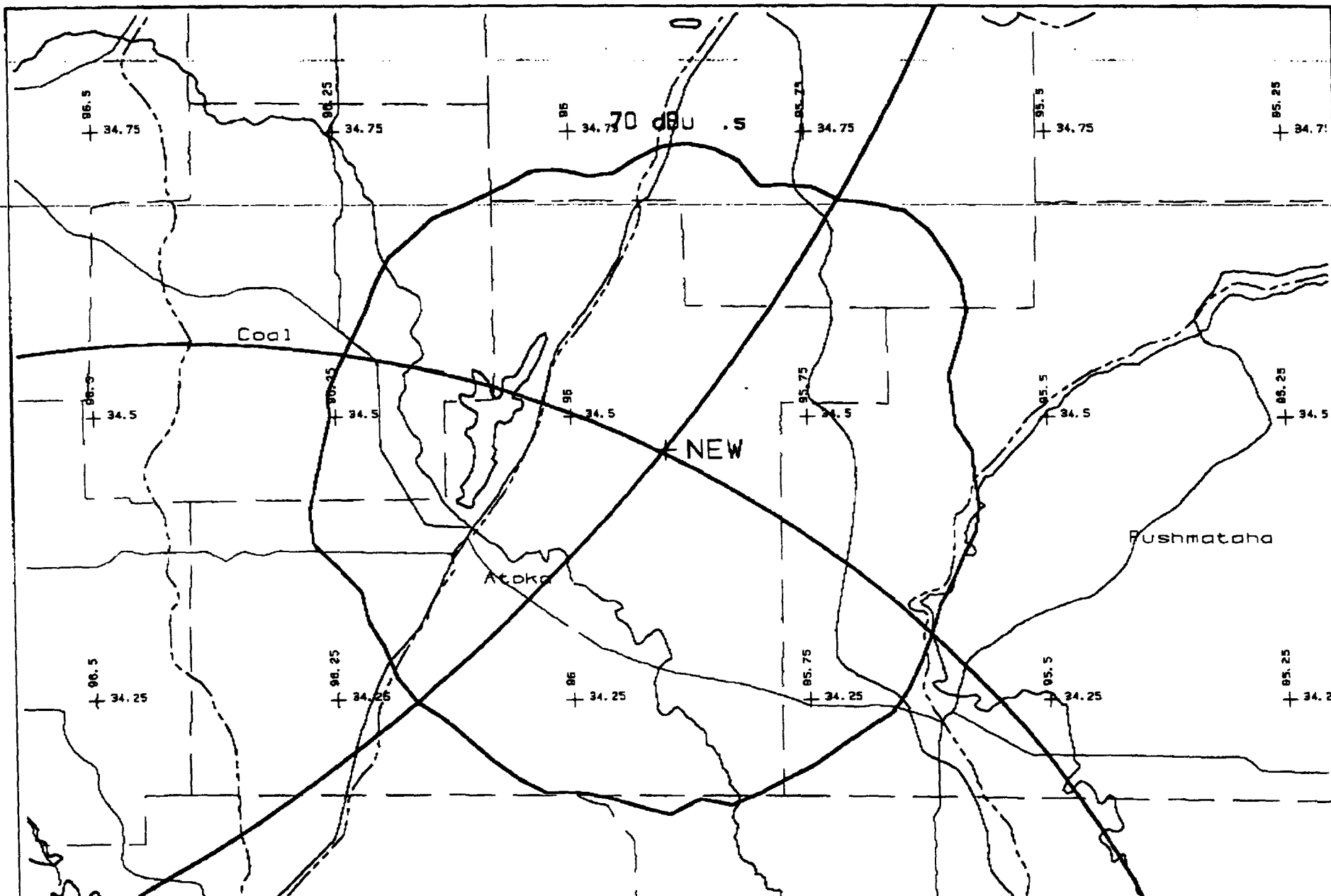
CLASS C2
Current rules spacings
CHANNEL 224 - 92.7 MHz

DISPLAY DATES
DATA 06-08-95
SEARCH 07-28-95

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD224	224C2	Blossom	TX	146.8	106.30	190.0	-83.70 *
DE224	224A	DE QUEEN	AR	108.6	152.72	166.0	-13.28 *
KDQNF	224A	De Queen	AR	108.6	152.72	166.0	-13.28 *
KOMAF	223C	Oklahoma City	OK	309.4	188.06	188.0	0.06 <
AD225	225A	Bells	TX	206.3	106.45	106.0	0.45 <
KBEZ.A	225C	Tulsa	OK	354.8	191.62	188.0	3.62
KBEZ	225C	Tulsa	OK	354.6	191.63	188.0	3.63
KTLS	227C1	Ada	OK	303.9	85.73	79.0	6.73
KPRVFM	223A	Heavener	OK	68.7	130.38	106.0	24.38
KPRVFM	223A	Heavener	OK	68.7	130.38	106.0	24.38
KZPS	223C	Dallas	TX	205.5	231.10	188.0	43.10
AD224	224A	Ozark	AR	58.5	215.26	166.0	49.26

THIS COUNTER PROPOSAL IS BASED UPON THE FACT THAT KDQN-FM, DE QUEEN, ARKANSAS, WILL BE DELETED AND RE ASSIGNED TO 227-A, AS PROPOSED IN RULE MAKING 8615.





Scale in km



NEW 224 50kW

N. Lat. 34 28 15

W. Lng. 95 54 01

SISK ENGINEER 95

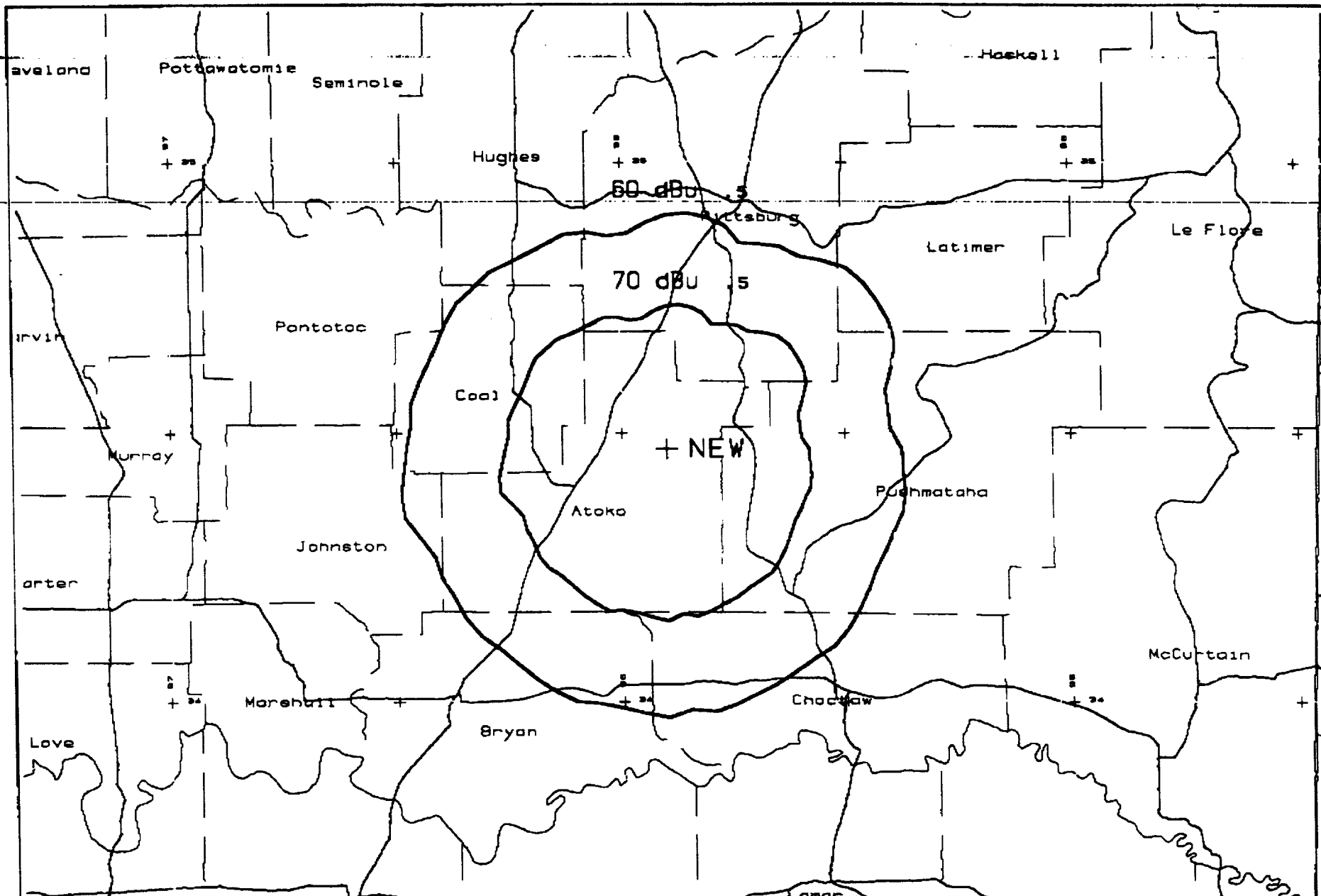
TERRAIN AND CONTOUR DATA
COALGATE OK.

ERP = 50 kW
FM - 2-6 Tables

Azimuth Deg T.	Ave. Elev. 3 to 16 km Meters AMSL	Effective Antenna Height Meters AAT	ERP (dBk)	F(50-50) Distance to 70 dBu Contour km	F(50-50) Distance to 60 dBu Contour km
0	259.7	120.4	16.990	29.5	48.0
45	226.2	153.9	16.990	33.0	52.7
90	258.2	121.9	16.990	29.7	48.3
135	227.0	153.1	16.990	33.0	52.6
180	201.2	178.9	16.990	35.6	55.5
225	209.3	170.8	16.990	34.8	54.7
270	222.7	157.4	16.990	33.4	53.1
315	236.4	143.7	16.990	31.9	51.3
<hr/>					
Ave. = 230.1 M 150.0 M					
Antenna Radiation Center AMSL = 380.1 M					

Geographic Coordinates:

North latitude: 34 28 15
West longitude: 95 54 01



Scale in km
0 10 20 30 40 50 60 70

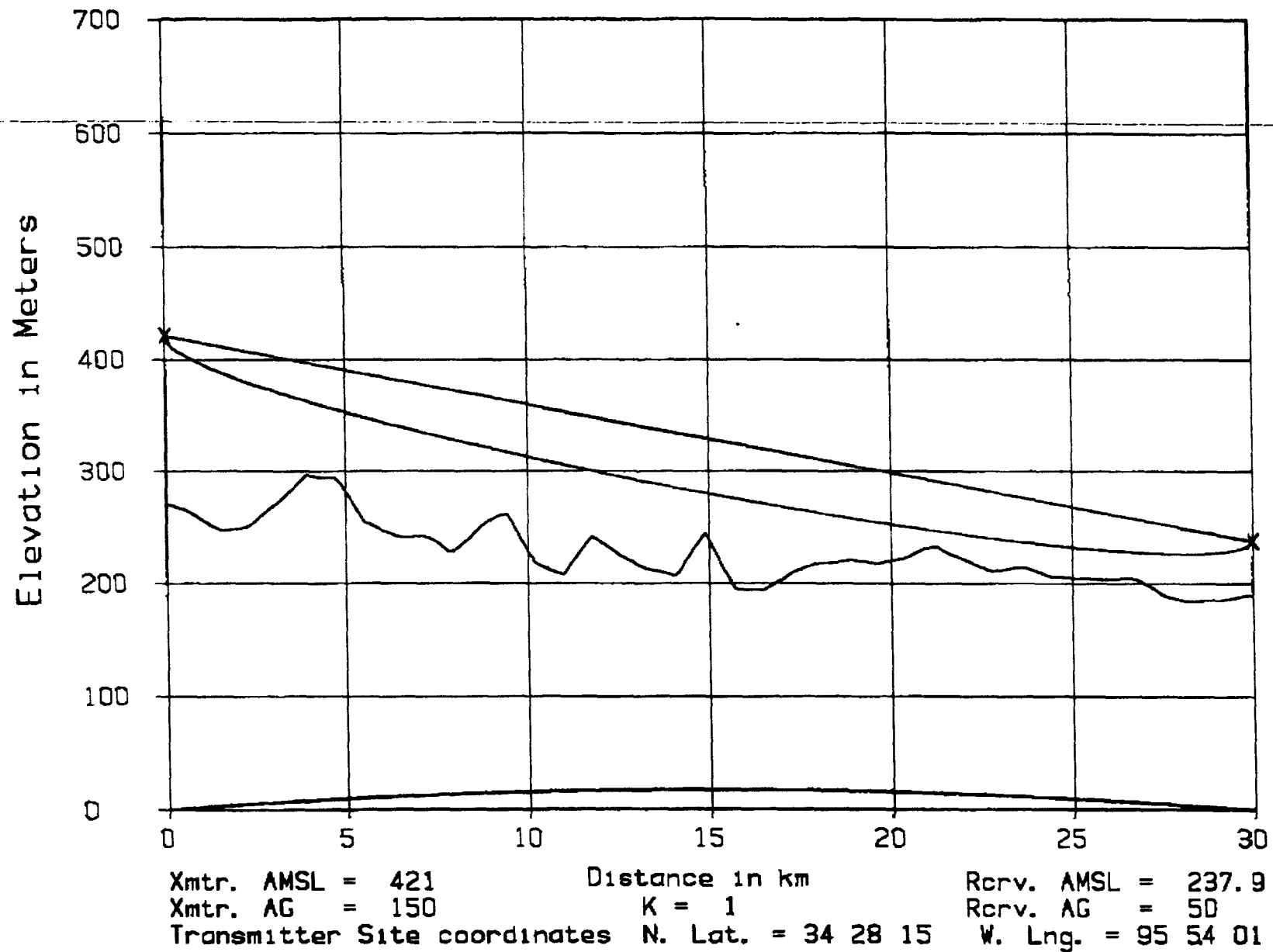
NEW 224 50kW

N. Lat. 34 28 15

W. Lng. 95 54 01

SISK ENGINEER - 07/95

TERRAIN PROFILE AT 283.41 DEGREES T.
COALGATE OK SITE

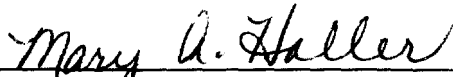


CERTIFICATE OF SERVICE

I, Mary A. Haller, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that true copies of the foregoing "Counter-Proposal of Coalgate Broadcasters" were sent this 28th day of July, 1995, by first-class United States mail, postage prepaid, to the following:

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Counsel for Red River
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Mary A. Haller